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*Attorneys for Defendant Corizon Health, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

FRANCISCO SANCHEZ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 20-CV-109
	)	
CORIZON HEALTH, INC. and its employees	)	
and agents; WYOMING DEPARTMENT OF	)	
CORRECTIONS and Director Robert Lampert;	)	
WYOMING MEDIUM CORRECTIONAL	)	
INSTITUTION AND Warden Michael Pacheco;	)	
WYOMING STATE PENITENTIARY and	)	
Warden Michael Harlow and JOHN DOES 1-10,	)	
true names unknown,	)	
	)	
Defendants.	)	

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**CORIZON HEALTH, INC.’S MEMORANDUM IN SUPPORT OF THE  
MOTION FOR SUMMARY JUDGMENT**

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**COMES NOW**, Defendant Corizon Health, Inc. (hereinafter “Corizon”), by and through its undersigned counsel of record, Scott E. Ortiz and Erica R. Day Williams, Porter, Day & Neville, P.C., and pursuant to Rule 56 of the Federal Rules of Civil Procedure, respectfully requests the Court enter judgment in Corizon’s favor as there are no material facts in dispute and Corizon is entitled to judgment as a matter of law.

In support of this motion, Corizon relies upon the pleadings of record, deposition testimony, and *Memorandum in Support of Corizon Health, Inc.s' Motion for Summary Judgment* and accompanying exhibits filed concurrently herewith.

- Exhibit 1: Transcript of the Deposition of Francisco Sanchez;
- Exhibit 2: Transcript of the Deposition of Gary Schmitz, MD;
- Exhibit 3: March 25, 2008 Encounter Record;
- Exhibit 4: Memorial Hospital of Carbon County-Operative Report;
- Exhibit 5: March 26, 2008 Pathology Reports;
- Exhibit 6: November 11, 2010 Memorial Hospital of Carbon County - Operative Report;
- Exhibit 7: November 11, 2010 Iverson Memorial Hospital-Pathology Report;
- Exhibit 8: April 19, 2010 Chronic Care Notes;
- Exhibit 9: June 9, 2014 Encounter Notes;
- Exhibit 10: Affidavit of Susanne Levene, MD;
- Exhibit 11: December 11, 2014 Encounter;
- Exhibit 12: Commissary Price List p. 3657 – 3658;
- Exhibit 13: Sanchez Inmate Account Summary;
- Exhibit 14: February 18, 2015 Health Service Request;
- Exhibit 15: February 24, 2015 Health Service Request;
- Exhibit 16: August 22, 2015 Health Service Request;
- Exhibit 17: January 30, 2018 Encounter;
- Exhibit 18: July 19, 2021 Encounter;
- Exhibit 19: Summit Pathology Report;

- Exhibit 20: April 10, 2016 Encounter;
- Exhibit 21: April 13, 2016 Encounter;
- Exhibit 22: May 18, 2016 Encounter;
- Exhibit 23: September 6, 2016 Encounter;
- Exhibit 24: April 16, 2018 Encounter;
- Exhibit 25: April 18, 2018 Encounter;
- Exhibit 26: Inmate/Resident Health Appraisal;
- Exhibit 27: April 20, 2020 Encounter;
- Exhibit 28: February 25, 2021 Health Service Request;
- Exhibit 29: March 2, 2021 Encounter;
- Exhibit 30: May 4, 2021 Encounter;
- Exhibit 31: WDOC Policy No. 3.100;
- Exhibit 32: May 28, 2021 Form 320 (Plaintiff's 1<sup>st</sup> Supp. Disc);
- Exhibit 33: June 4, 2021 Grievance Responses (Plaintiff's 1<sup>st</sup> Supp. Disc);
- Exhibit 34: June 4, 2021 Grievance Responses (Plaintiff's 1<sup>st</sup> Supp. Disc);
- Exhibit 35: July 9, 2019 Letter (Plaintiff's 1<sup>st</sup> Supp. Disc);
- Exhibit 36: Public Records' Request for Francisco Sanchez Grievances;
- Exhibit 37: September 30, 2018 Record Review

**WHEREFORE**, Defendant Corizon Health, Inc. respectfully requests the Court enter summary judgment in its favor.

**DATED** this 3<sup>rd</sup> day of August, 2021.

**CORIZON HEALTH, INC.**

/s/ Erica R. Day

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